

FILED**Apr 28 - 2021**

AT 11 O'CLOCK 11 MINUTES

John M. Domurad, Clerk

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

Case No. 3:21-MJ- 249 (TWD)

Randolph Bullock,**Defendant(s)****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of January 2018 in the county of Tompkins in the Northern District of New York the defendant(s) violated:

*Code Section***Title 18, United States Code, Section 2252A(a)(5)(B)***Offense Description***Possession of Child Pornography**

This criminal complaint is based on these facts:
See Attached Affidavit

☒ Continued on the attached sheet.

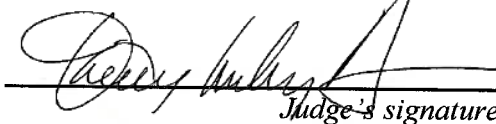

Complainant's signature

James J. Markovich, Special Agent, FBI

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: April 28, 2021


Judge's signature

City and State: Syracuse, New York

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, James J. Markovich, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of the FBI since October 2003 and am currently assigned to the Albany Division, Ithaca (NY) Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to cyber-crimes and crimes against children. I am currently investigating federal violations concerning child pornography and the sexual exploitation of children. I have gained experience regarding such crimes through training in seminars, classes, and everyday work related to conducting these types of investigations.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18 United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1). As an FBI Special Agent, I am authorized to seek and execute federal arrest and search warrants for Title 18 criminal offenses, including offenses related to the sexual exploitation of minors, specifically those involving the possession and distribution/receipt of child pornography in violation of Title 18, United States Code, Section 2252A.

3. I make this affidavit in support of a criminal complaint charging RANDOLPH BULLOCK with knowingly possessing child pornography, in violation of Title 18 United States Code, Section 2252A(a)(5)(B).

4. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and on my experience and training as a Special Agent of the FBI. As this affidavit is being submitted for the limited purpose of securing

a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that RANDOLPH BULLOCK has violated Title 18 United States Code, Sections 2252A(a)(5)(B).

Details of the Investigation

5. On or about January 8, 2018, the executives at a private company, located in Ithaca, New York, and within the North District of New York, received an anonymous letter from an employee regarding potentially illegal conduct by another employee, RANDOLPH BULLOCK. Specifically, the letter accused BULLOCK of having pornographic images depicting potentially under-aged individuals on his work computer. BULLOCK was placed on administrative leave. BULLOCK's three work computers were taken to a local computer store to be forensically analyzed.

6. Shortly after starting their forensic analysis on BULLOCK's desktop computer, an employee at the local computer store located images on the computer that he/she determined to be child pornography. The computer store contacted the New York State Police (hereinafter NYSP). BULLOCK's employers were notified of the existence of child pornography and terminated BULLOCK.

7. On the same date, NYSP Trooper Jenna Kozel responded to the computer store and was shown images from BULLOCK's desktop. Trooper Kozel determined that there were images depicting child pornography. Trooper Kozel seized the three computers as evidence.

8. Trooper Kozel also responded to BULLOCK's employer to further investigate the usage of BULLOCK's three work computers. One employee at BULLOCK's place of employment, EMPLOYEE 1, told NYSP Trooper Kozel that he/she had seen pornographic images on BULLOCK's computer screen on numerous occasions within the last several months while

BULLOCK was using his work computer in his cubicle. EMPLOYEE 1 was not certain if any of the individuals in the pornographic images were under-aged but stated that some of them looked young. EMPLOYEE 1 observed that BULLOCK appeared to be accessing pornographic images within a specific file path/folder on the C: drive of one of his work computers. EMPLOYEE 1 provided the NYSP with the specific path/folder. EMPLOYEE 1 had also observed a spreadsheet on BULLOCK's work computer screen that had internet website addresses listed that contained words such as, "young," "girls," and "boys." EMPLOYEE 1 later explained to law enforcement that he/she also noticed that BULLOCK appeared to be accessing folders and/or files over a flash drive attached to BULLOCK's desktop computer and that the names of some of the folders and/or files referenced young children, boys, families or related terms, and, therefore, appeared suspicious taken into context with the images EMPLOYEE 1 observed on BULLOCK's computer.

9. On or about January 9, 2018, NYSP Investigator Timothy Mones obtained consent from BULLOCK's employer to search their three computers that BULLOCK had used during his employment.¹ Later in the same day, BULLOCK's employer provided three signed NYSP "Voluntary Consent to Search" forms.

10. On or about mid-2019, the NYSP completed a full forensic analysis of one of the three computers, BULLOCK's desktop computer, serial number 2UA42709GM (hereafter referred to as the "COMPUTER"). The NYSP determined that approximately 362 image files depicted possible child pornography. Some of the images were found in the specific file path/folder described by EMPLOYEE 1. I have since reviewed the NYSP forensic analysis and have

¹ On or about February 1, 2019, BULLOCK's employer provided the NYSP with a copy of BULLOCK's General Handbook Acknowledgement form, signed by BULLOCK. On or about February 19, 2019, the same executive provided your affiant with a copy of their "General Employee Handbook" which explained, in relevant part, that users have no expectation of privacy in their use of the employer's systems.

determined that child pornography, as defined by 18 U.S.C. § 2256(8), is present on the COMPUTER. Specifically, three of the images depicting child pornography found on the COMPUTER are described as:

- a) images_285.jpg – This image depicts a nude pre-pubescent minor female lying on a bed on her back with her vagina exposed in a lewd and lascivious manner. The pre-pubescent minor female’s vagina is the focal point of the image.
- b) F4T2RYK5q2zDGNZcrNsQZ1wFSHGUK0pKkjKEHsaYhZmjgqWpv_QMBIoAHEp36Pe3eYQPZUBKms3HJjFy2eD15ClhHCDlXT0511b5B4bonZI.jpg (herein referred to as F4T2R...bonZI.jpg) – This image depicts a nude pre-pubescent minor male squatting with his penis and testicles exposed in a lewd and lascivious manner. The pre-pubescent minor’s penis and testicles are the focal point of the image.
- c) images_048.jpg – This image depicts two nude pubescent minor females lying on a couch, with one on top of the other, facing away from the camera. The prepubescent minor females have their vaginas and anuses exposed in a lewd and lascivious manner.

11. The NYSP forensic analysis of the COMPUTER located an Excel spreadsheet file on the COMPUTER. The author of the Excel spreadsheet file within the file’s properties was “Bullock, Randy.” The Excel spreadsheet file had a tab labeled “searches” and within it were search and/or keyword terms associated with child pornography. The Excel spreadsheet file also had a tab labeled “links” and within it were internet website addresses that had child pornography associated keywords within some of their names. Some of the search terms in the spreadsheet included “RU Small Boys Penis” and “little boy intact penis.”

12. The NYSP forensic analysis of the COMPUTER also located internet search queries containing keywords consistent with searches for child pornographic content including “Naked Toddler Boys Penis Erection.” The NYSP forensic analysis of the COMPUTER further

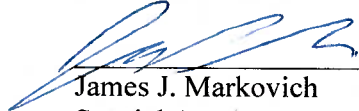
located attribution data linking the COMPUTER to BULLOCK. For example, the COMPUTER was named "ITH_BULLOCKR" and a domain user account called "rbullock" was located on the COMPUTER. Numerous emails associated with an email account utilized by BULLOCK were also located within the "rbullock" domain user account on the COMPUTER. Many of the email messages were sent and/or received by BULLOCK on the same dates that images of child pornography were created on the COMPUTER.

13. The images of child pornography located on BULLOCK's COMPUTER were located largely on BULLOCK's COMPUTER hard drive, a Seagate Barracuda 500GB internal hard drive made in Thailand.

Conclusion

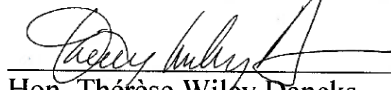
14. Based upon the above information, there is probable cause to establish that RANDOLPH BULLOCK has violated Title 18, United States Code, Section 2252A(a)(5)(B) which prohibits knowingly possessing child pornography that has been transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, and request that a criminal complaint be issued pursuant to this violation of federal law.

ATTESTED TO BY THE AFFIANT



James J. Markovich
Special Agent
Federal Bureau of Investigation

I, the Honorable Thérèse Wiley Dancks, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on April 28, 2021 in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure



Hon. Thérèse Wiley Dancks
United States Magistrate Judge